

Exhibit D-2

Chicago, IL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VOLUME II

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Chicago, IL

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1 moment.

2 Q. Did Abbott ever report to the government
3 the differences between its contract prices and its
4 list prices from 1993 through 2003 for the subject
5 drugs?

6 MS. CITERA: Objection to the form, outside
7 the scope.

8 BY THE WITNESS:

9 A. I don't know that they did that.

10 Q. Sir, did Abbott understand that its
11 obligations under the False Claims Act and to
12 comply with the false claims were not just
13 obligations concerning what it -- concerning
14 knowing violations of the False Claims Act but also
15 reckless or inadvertent conduct in its price
16 reporting?

17 MS. CITERA: Object to the form, outside the
18 scope. Also I'd caution you not to reveal any
19 privileged communications or analysis.

20 BY THE WITNESS:

21 A. Without being able to recite the OIG
22 guidance in 2003, I would suggest that in 2003,

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